

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

BASSAM NABULSI and  
RIMA NABULSI,

Plaintiffs,

v.

H.H. SHEIKH ISSA BIN ZAYED AL  
NAHYAN,

Defendant.

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CIVIL ACTION NO. H-06-02683

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**DEFENDANT H.H. SHEIKH ISSA BIN ZAYED AL NAHYAN'S  
RESPONSE TO PLAINTIFF'S MOTION TO QUASH DEPOSITIONS  
OF BASSAM NABULSI AND RIMA NABULSI**

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Defendant Sheikh Issa Bin Zayed Al Nahyan ("Sheikh Issa") files this response to Plaintiffs' Motion to Quash Depositions of Bassam Nabulsi and Rima Nabulsi. In support of this Response, Sheikh Issa would show the Court as follows:

1.

Plaintiffs' motion should be denied as moot. Plaintiffs' motion was filed prematurely and needlessly. Sheikh Issa sent deposition notices for the Plaintiffs to their counsel. In the cover letter that accompanied the notices, counsel for the Defendant clearly stated that if the dates identified were not convenient, to please provide Defendant's counsel with alternative dates. Counsel for Plaintiffs immediately wrote back and informed Defendant's counsel that the dates were not convenient and suggested dates in November and demanded that we agree to the suggested dates. Before Defendant's counsel could even respond, Plaintiffs filed this

unnecessary motion. Because Sheikh Issa will agree to alternative dates in November<sup>1</sup> for the Plaintiffs' deposition, this motion should be denied as moot. Perhaps next time Plaintiffs will give the Defendant the opportunity to respond before filing needless motions with the Court.

2.

WHEREFORE, PREMISES CONSIDERED, Defendant H.H. Sheikh Issa Bin Zayed Al Nahyan respectfully requests that Plaintiffs' motion be denied. Defendants also request that Defendants be awarded any and all further relief, in law or in equity, to which they may be justly entitled.

Respectfully submitted,

BECK, REDDEN & SECREST, L.L.P.

By: /s/ Alistair B. Dawson  
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**ATTORNEY-IN-CHARGE FOR DEFENDANT  
H.H. SHEIKH ISSA BIN ZAYED AL NAHYAN**

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<sup>1</sup> Sheikh Issa has sent amended deposition notices scheduling the depositions on November 13 and 14, 2008.

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing instrument was served upon all counsel of record on October 7, 2008, in accordance with the Federal Rules of Civil Procedure.

/s/ Alistair B. Dawson

Alistair B. Dawson